

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

ePLUS INC.,	)
	)
Plaintiff,	)
	)
v.	) Case No. 3:09CV620 (REP)
	)
LAWSON SOFTWARE, INC.,	)
	)
	)
Defendant.	)

**DEFENDANT LAWSON SOFTWARE, INC.'S OBJECTIONS TO PLAINTIFF'S  
DESIGNATIONS OF THE DEPOSITION OF DEAN J. HAGER (MARCH 22, 2013)**

Lawson Software, Inc. ("Lawson") hereby objects as follows to the portions of the deposition of Dean J. Hager taken on March 22, 2013 designated by ePlus, Inc.:

<b>Plaintiff's Designations</b>	<b>Lawson's Objections</b>	<b>Lawson's Summary</b>
8:6 – 9:14		
9:18 – 10:19		
11:16 – 11:21		
12:16 – 13:6		
13:18 – 13:20		
13:24 – 16:2		
17:4 – 18:16		
18:18 – 19:11		
21:1 – 21:7		
21:23 – 21:25		
23:10 – 23:19		
24:3 – 24:9		
25:18 – 26:7		
27:1 – 27:13		
27:20 – 27:24		
28:3 – 28:10		
34:7 – 35:3		
35:13 – 35:16		
35:19 – 36:1		
36:7 – 37:24		

Plaintiff's Designations	Lawson's Objections	Lawson's Summary
38:2–38:21		
39:13–40:5		
40:7–40:13	602, 611.	Objection to 40:3-40:13. Lack of personal knowledge. Improper form.
40:15–40:17		
41:3–41:10		
42:5–42:21	401, 402, 602, 802, 805.	Relevance. Lack of personal knowledge. Hearsay.
42:24–43:12		
43:14–43:21		
43:23–44:7	401, 402, 602, 611.	Objection to 44:8-44:15. Relevance. Improper form. Lack of personal knowledge.
45:4–45:7		
45:10		
45:18–45:23	401, 402, 602, 611.	Relevance. Lack of personal knowledge. Improper form.
45:25		
46:11–46:17	401, 402, 602, 611.	Relevance. Lack of personal knowledge. Improper form.
46:20–46:21		
47:6–47:19		
47:21–48:16		
48:18–48:21		
49:14–50:8		
50:11–50:16		
51:3–51:7		
51:9–51:11		
51:23–52:10	602, 611.	Objection is to 52:6-52:10. Lack of personal knowledge. Improper form.
52:13–52:14		
53:21–54:5	611.	Objection to 54:3-4. Improper form.
54:8–54:12	611.	Improper form. Argumentative.
54:17–54:24	611.	Improper form. Argumentative.
55:17–56:13	611.	Objection to 56:9-56:13. Improper form. Argumentative.
56:16–56:25		
57:9–57:11	611.	Improper form.

Plaintiff's Designations	Lawson's Objections	Lawson's Summary
		Argumentative.
57:14–57:16	611	Improper form. Argumentative.
57:18		
58:24–59:15	401, 402, 611.	Relevance. Improper form.
59:17	401, 402, 611.	Relevance. Improper form.
59:20–60:15	401, 402, 611.	Relevance. Improper form.
60:21–61:8	401, 403, 611.	Relevance. Improper form.
61:10–61:21	401, 402.	Objection to 61:15-61:21. Relevance.
61:24–62:6		
62:8 – 62:18	401, 402, 602, 611.	Relevance. Improper form. Argumentative. Lack of personal knowledge.
62:20 – 63:1	401, 402, 602, 611.	Objection to 62:21-62:23. Relevance. Improper form. Argumentative. Lack of Personal Knowledge.
63:12 – 64:16	401, 402, 403, 602, 611, 802, 805.	Relevance. Improper form. Lack of probative value. Lack of personal knowledge. Hearsay. Cumulative.
64:20 – 64:23	401, 402, 403, 802, 805.	Relevance. Cumulative. Asked and answered. Hearsay.
65:1 – 65:8	401, 402, 403, 602, 611, 802, 805.	Relevance. Improper form. Lack of personal knowledge. Hearsay.
65:11 – 65:15	401, 402, 403, 602, 611, 802, 805.	Relevance. Improper form. Lack of personal knowledge. Hearsay.
65:18 – 66:1	401, 402, 403, 602, 611.	Objection to 65:25-66:1. Relevance. Improper form. Lack of personal knowledge.
66:4 – 66:8	401, 402, 403, 602, 611, 802, 805.	Objection to 66:6-66:8. Relevance. Improper form. Lack of personal knowledge. Hearsay.
66:11 – 66:18	401, 402, 403, 602, 611, 802, 805.	Objection to 66:14-66:18. Relevance. Improper form. Argumentative. Lack of personal knowledge. Asked and answered. Hearsay.
66:21 – 67:1	401, 402, 403, 602, 611.	Objection to 66:23-67:1. Relevance. Improper form. Argumentative. Lack of

Plaintiff's Designations	Lawson's Objections	Lawson's Summary
		personal knowledge.
67:3 – 67:6	401, 402, 403, 602, 611.	Objection to 67:4-67:6. Relevance. Improper form. Argumentative. Lack of personal knowledge.
67:9 – 67:10		
70:22 – 71:14	401, 402, 602, 611, 802, 805.	Relevance. Improper form. Lack of personal knowledge. Hearsay.
71:17 – 71:19		
71:23 – 72:1		
72:3 – 72:19		
72:21 – 73:8		
73:10 – 74:19	401, 402, 802, 805.	Objection to 74:1-74:9. Relevance. Hearsay.
75:22 – 76:17		
77:2 – 77:17	401, 402.	Relevance.
79:17 – 79:25		
80:4 – 80:16	401, 402, 602, 611, 802, 805.	Objection to 80:13-16. Relevance. Improper form. Hearsay.
80:19 – 81:11		
81:15 – 82:6		
82:12 – 82:18		
82:24 – 83:1		
83:8 – 83:10	401, 402, 602, 611.	Relevance. Improper form. Lack of personal knowledge.
83:13 – 83:23	602.	Lack of personal knowledge.
86:9 – 86:15	401, 402 611, 802.	Relevance. Improper form. Hearsay.
86:17 – 87:12	401, 402 611, 802.	Relevance. Improper form. Hearsay.
87:18 – 88:10	401, 402, 802, 805.	Relevance. Hearsay.
88:14 – 89:7	401, 402, 602, 611, 802, 805.	Relevance. Improper form. Lack of personal knowledge. Hearsay.
89:10 – 90:12	401, 402, 602, 611, 802, 805.	Objection to 89:17-90:5. Relevance. Improper form. Lack of personal knowledge. Hearsay.
90:14 – 91:21	401, 402, 602, 611.	Relevance. Improper form. Lack of personal knowledge.
91:23 – 92:2	401, 402, 611.	Relevance. Improper form.
92:4 – 92:21		

Plaintiff's Designations	Lawson's Objections	Lawson's Summary
93:1 – 93:8		
94:15 – 95:1	401, 402, 602, 611.	Relevance. Improper form. Argumentative. Lack of personal knowledge.
95:4 – 95:19		
95:22		
98:12 – 99:11	401, 402, 602, 611, 802, 805..	Objection to 99:8-11. Relevance. Improper form. Lack of personal knowledge. Hearsay.
99:13 – 99:19		
99:21 – 99:24		
100:7 – 100:10	401, 402, 602, 611.	Relevance. Improper form. Lack of personal knowledge. Asked and answered.
100:13 – 100:15		
100:23 – 101:21		
102:24 – 103:2	401, 402, 602, 611.	Relevance. Improper form. Lack of personal knowledge.
103:4 – 103:9		
103:16 – 104:20		
105:10 – 105:19	401, 402, 602, 611.	Objection to 105:17-19. Relevance. Improper form. Lack of personal knowledge. Misstates document.
105:21 – 105:22		
106:4 – 106:6		
106:8 – 108:7	401, 402, 602.	Objection to 107:15-19. Relevance. Lack of personal knowledge.
113:14 – 114:20		
115:12 – 115:24		
116:16 – 117:13	401, 402, 602, 611, 802, 805.	Objection to 117:10-13. Relevance. Improper form. Lack of personal knowledge. Hearsay.
117:16 – 118:5	401, 402, 602, 611.	Relevance. Improper form. Lack of personal knowledge.
118:8 – 120:7	401, 402, 602, 611.	Relevance. Improper form. Lack of personal knowledge. Misstates the testimony.
120:11 – 120:18	401, 402, 403, 602, 611.	Objection to 120:14-18. Relevance. Improper form. Lack of personal knowledge.

<b>Plaintiff's Designations</b>	<b>Lawson's Objections</b>	<b>Lawson's Summary</b>
		Argumentative. Cumulative. Asked and answered.
120:20 – 121:1		
121:9 – 121:13		
121:19 – 123:11	401, 402, 602, 611, 802, 805.	Relevance. Improper form. Lack of personal knowledge. Hearsay.
123:13 – 124:9	401, 402, 602, 611, 802, 805.	Relevance. Improper form. Lack of personal knowledge. Hearsay.
124:12 – 124:21	401, 402, 602, 611.	Relevance. Improper form. Lack of personal knowledge.
125:2 – 127:11	401, 402, 602, 611, 802, 805.	Objection to 125:8-126:11. Relevance. Improper form. Lack of personal knowledge. Hearsay.
128:7 – 128:21		
129:18 – 130:15	401, 402, 602, 611.	Objection to 130:9-15. Relevance. Improper form. Lack of personal knowledge.
130:18 – 131:25		
132:12 – 132:20		
139:16 – 140:8	401, 402, 403.	Objection to 140:8. Relevance. Asked and answered.
140:12 – 140:23		
141:4 – 141:22		
141:25 – 142:23		
143:1 – 143:23		
144:1 – 144:10		
144:17 – 144:22		
145:4 – 147:1		
147:4 – 148:9	401, 402, 403, 611.	Objection to 147:6-148:9. Relevance. Improper form. Argumentative. Cumulative.
148:11 – 148:22	401, 402, 602, 611.	Objection to 148:21-23. Relevance. Improper form. Argumentative.
148:25		
151:5 – 152:14	401, 402, 602, 611, 802, 805.	Objection to 151:25-152:14. Relevance. Improper form. Lack of personal knowledge. Hearsay.
152:16 – 152:20		

<b>Plaintiff's Designations</b>	<b>Lawson's Objections</b>	<b>Lawson's Summary</b>
153:2 – 153:18	401, 402, 602, 611.	Relevance. Improper form. Lack of personal knowledge.
153:24 – 154:11	401, 402, 602, 611.	Relevance. Improper form. Lack of personal knowledge. Lack of foundation.
154:14 – 154:21		
154:25 – 155:22	401, 402, 602, 611.	Relevance. Improper form. Lack of personal knowledge. Lack of foundation.
155:24 – 157:9	401, 402, 602, 611, 802, 805.	Relevance. Improper form. Lack of personal knowledge. Hearsay.
157:11 – 157:14		
158:4 – 158:13 (direct)		
162:19 – 163:6 (direct)		
164:15 – 166:4 (direct)		
170:4 – 171:1 (direct)		
173:8 – 173:14 (direct)		
179:5 – 179:24 (direct)		
180:8 – 181:5 (direct)		
181:20 – 182:15 (direct)		
193:1 – 194:7 (recross)	401, 402, 602, 611.	Relevance. Improper form. Lack of personal knowledge.
195:15 – 195:18 (recross)		
196:3 – 196:6 (recross)		
198:15 – 198:25 (recross)	401, 402, 611.	Relevance. Improper form.
199:3 – 199:5 (recross)		
199:22 – 200:12 (recross)		
200:16 – 200:20 (recross)	401, 402.	Relevance.

Dated: March 27, 2013

LAWSON SOFTWARE, INC.

By: \_\_\_\_\_/s/\_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I certify that on this 1<sup>st</sup> day of April, 2013, a true copy of the foregoing will be filed electronically with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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